Christopher Hays and Linsay Bradbury v.

Linsay Bradbury October 30, 2020

Page 35

Bobby Briggs, et al LINSAY BRADBURY Page 33 1 A It was possession of drug paraphernalia and theft of property. 3 Q Do you remember what the charge was on the 2014 one? 4 A Possession of drug paraphernalia, because I was in a car that drug paraphernalia was found in. I've seen that scenario quite a bit. 6 O I bet you have. 7 Α Anything else? 8 O No, that's it. 9 A

Have you ever declared bankruptcy? 10 Q

11 A No. sir.

Have you used illegal drugs? 12 Q

Α In my lifetime? 13

14 Q Yes.

Yes, I have. 15 A

Which ones have you used? 16 Q

A I have used methamphetamine, as well as I did -- I'm 17

trying to think what it was. Prescription medication.

Q Did you use any illegal drugs during your employment

with Bobby? 20

No, I did not. 21 A

22 Q Have you ever taken money from Queens Manor Apartments,

other than a paycheck?

What do you mean by that exactly? Like --

25 Q Like have you ever removed cash from the office? LINSAY BRADBURY

1 deciding that I wanted to go to the office and work. It was

mostly work that I was doing after 6:00 would be -- I mean,

sometimes it was in the office, don't get me wrong, but a lot

of times it was finishing getting an apartment ready because

I had somebody that had already rented it or that was coming

the following day, and there was always a lot of damage in

the apartments, and cleaning and things like that, and so

there was that situation, as well as there were times that

Bobby specifically would tell me that I needed to -- like an

example would be Combs Apartments, their sewer would back up

a lot and would back up into their -- their showers and the 11

other just walk-in showers, so it would end up -- the sewage 12

would go into their actual apartment, and so there were times 13

that Bobby would tell me to go get the -- the snake and snake

out the plumbing lines after -- you know, after I had already 15 left, or there were -- I mean, he contacted me outside of

business hours all the time, but he specifically requested me

on a few occasions.

I'm sorry to cut you off, but you're talking about 19

normal business hours, and earlier you said 6. Is 6 the

closing time there? Or what is 6:00? 21

Yes. The office hours are 9 a.m. until 6 p.m. 22 Α

Okay. And what was your normal schedule there? 23 O

My normal schedule, like what I normally would work? I

usually would work -- if I just had to like -- on average,

LINSAY BRADBURY Page 34 LINSAY BRADBURY Page 36

Besides quarters to wash laundry with, no.

Have you ever stolen any property from Queens Manor?

3 A No.

4 Q I'm going to double-check, but I think that's all that I

5 have. Oh. No. We've discussed your -- we've discussed your

work for Bobby and your claims about hours; correct?

Uh-huh. 7 Α

8 Q All right. Is there anything that's important about it

that you and I have not discussed today?

10 A Not that I can think of off the top of my head, but

again, if there is, I will gladly let my attorney know so he

can pass the information on to you.

13 Q Excellent. Excellent. Thank you so much. That's all I

14 have.

15 A Okay.

EXAMINATION 16

BY MR. HOYT: 17

Q All right. Just real quick. You mentioned earlier that

there was a lot of time that you'd be working, you know, 19

20 outside of normal business hours, I believe is what you had

said. I can't remember the exact words you used, but is this 21

22 something that you would be called out to do or that you

would do -- you know, just you would decide to go up to the

24 office and work?

25 A It was, I guess, a mixture of both. It wasn't me just

let's say -- we'll say kind of leaving at around 8:30 at

night was about average, we will say. I'd very, very rarely

actually -- I don't actually remember a single day that I

actually left at 6:00.

And how many days per week did you work? O

A If I had an assistant, I would work five. But a lot of

times I would still end up having to work six. But I didn't

have an assistant for very long, the couple of times that I

did. But, again, most of the time I would still have to work

10 six days a week.

[Witness' phone falls.] 11

Q (By Mr. Hoyt) You okay? 12

13 Α I'm sorry. My phone just fell.

All right. Well, that is --14 Q

On average, six. 15 Α

O Okay. All right. Well, that's all the questions I had 16

for you. 17

Okav. Perfect. 18 A

WHEREUPON, the deposition was concluded at 11:39 a.m. on

October 30, 2020.

21

22

23

24

25